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Attorneys for Lead and Named Plaintiffs and the Prospective Class

Figueira Decl. Tab

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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THE FOOTBALL ASSOCIATION PREMIER :
LEAGUE LIMITED, BOURNE CO. (together :
with its affiliate MURBO MUSIC PUBLISHING, :
INC.), CHERRY LANE MUSIC PUBLISHING :
COMPANY, INC., CAL IV ENTERTAINMENT :
LLC, ROBERT TUR d/b/a LOS ANGELES :
NEWS SERVICE, NATIONAL MUSIC :
PUBLISHERS' ASSOCIATION, THE :
RODGERS & HAMMERSTEIN :
ORGANIZATION, STAGE THREE MUSIC :
(US), INC., EDWARD B. MARKS MUSIC :
COMPANY, FREDDY BIENSTOCK MUSIC :
COMPANY d/b/a BIENSTOCK PUBLISHING :
COMPANY, ALLEY MUSIC CORPORATION, :
X-RAY DOG MUSIC, INC., FÉDÉRATION :
FRANÇAISE DE TENNIS, THE SCOTTISH :
PREMIER LEAGUE LIMITED, THE MUSIC :
FORCE MEDIA GROUP LLC, THE MUSIC :
FORCE LLC, and SIN-DROME RECORDS, :
LTD. on behalf of themselves and all others :
similarly situated, :
:
Plaintiffs, :
:
v. :
:
YOUTUBE, INC., YOUTUBE, LLC and :
GOOGLE, INC., :
:
Defendants. :
----- X

07 Civ. 3582 (LLS)

AMENDED CLASS ACTION
COMPLAINT

JURY TRIAL DEMANDED

33. Plaintiff The Scottish Premier League Limited (“SPL”) is the top division of Scottish soccer. SPL is incorporated under the UK Companies Acts, having a registered office at Hampden Park, Glasgow, G42 9DE. SPL owns the copyright and/or the relevant exclusive rights in the following Protected Works, consisting of audiovisual footage featuring coverage of soccer matches, among others:

- A. Aberdeen v Rangers, May 20, 2007.
- B. Aberdeen v Celtic, August 19, 2007.
- C. Rangers v Aberdeen, March 17, 2007.

34. The SPL Works are not “United States works” within the meaning of the U.S. Copyright Act and are therefore not subject to any registration requirements under U.S. copyright law.

The Music Force

35. Plaintiffs The Music Force Media Group LLC, a major independent record company organized under the laws of Tennessee, The Music Force LLC, a highly respected independent music publisher organized under the laws of Tennessee, and Sin-Drome Records, Ltd., an independent record company incorporated in California, together with their affiliated and related companies (collectively, “The Music Force”), all with a principal place of business at 4658 Wortser Ave. Sherman Oaks, CA, 91423, represent musical compositions embodied in sound recordings which have sold in excess of 50 million units, recorded by Artists such as Alicia Keyes, Neil Diamond, Peter Cetera, Anita Baker, Tupac Shakur, and Notorious B.I.G.; have received multiple Grammy nominations, including a Grammy award and other awards; and